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FOUNDED 1866

May 23, 2007

**VIA HAND DELIVERY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002

Rc: United States Cellular Corporation  
Petition for Reconsideration  
Request for a Limited Waiver of Section 20.18(g)(1)(v)  
CC Docket No. 94-102

Dear Ms. Dortch:

United States Cellular Corporation ("USCC") hereby submits this supplement to its Petition for Reconsideration filed on February 5, 2007. By this Supplement, USCC provides additional and more specific information about USCC's GPS-capable handset penetration levels at various points during the past 18 months. While USCC has typically reported GPS-capable handset levels by the end of the relevant quarter even if the actual level was reached during the quarter, it now has provided more precise figures for more specific dates in meetings with various FCC staff and the Offices of the Commissioners. These figures, which are the result of a more detailed analysis of its customer database, are confirmed by this letter.

First, USCC confirms that its GPS-capable handset penetration level as of December 31, 2005 was no less than 88.76 percent. Although USCC reported a worst case handset penetration level of 85 percent in its Request For a Limited Waiver, as it explained in that filing, it had every reason to believe that its actual penetration was higher, although not up to 95 percent.

Second, USCC confirms that its GPS-capable handset penetration was at least 94.84 percent as of July 15, 2006. In its August 1, 2006 quarterly E911 report, USCC reported that its handset penetration as of July 15, 2006 was between 94.1 percent and 94.9 percent. The more detailed review of USCC's database confirms that the handset percentage was at least 94.84 percent by July 15, 2006.

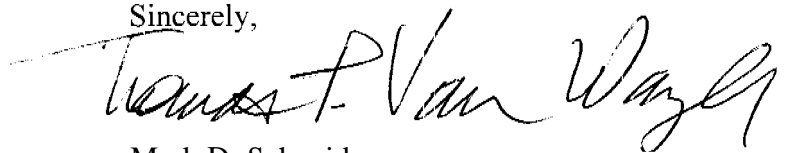
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Third, USCC confirms that its GPS-capable handset penetration level reached 95 percent by August 31, 2006. As before, while USCC filed a supplement to its waiver request on October 12, 2006 reporting that its GPS-capable penetration rate was 94.84 percent as of September 30, 2006, the more detailed database analysis of the calculations disclosed in the October supplement confirms that the handset penetration level reached 95 percent by the end of August.

Finally, USCC reports that its GPS-capable handset percentage as of April 30, 2007 was 96.05 percent. As referenced in its October 12 waiver supplement, in the last four months of 2006 USCC integrated into its regional cellular systems various markets acquired from other carriers. Because these markets had lower GPS-capable handset penetration levels, USCC's overall GPS-capable handset penetration level dropped very slightly from time to time during this period, although never more than 0.5 percent. Nevertheless, USCC can confirm that as of July 15, 2006 its penetration level was 94.84 percent, by August 31, 2006 it had reached 95 percent, and that as of April 30, 2007 USCC's GPS-capable handset penetration level exceeded 96 percent. USCC's efforts and penetration levels are summarized in the attached "USCC Efforts At Compliance With E911 Handset Rules."

Please direct any questions regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas P. Van Wazer". The signature is fluid and cursive, with a large initial "T" and "V".

Mark D. Schneider  
Thomas P. Van Wazer

Attachment

## **USCC Efforts At Compliance With E911 Handset Rules**

1. **FCC Requirement:** Begin selling and activating location-capable handsets no later than **March 1,2003.**

- USCC actually began in December 2002, three months early.
- By March 31, 2003, USCC had sold more than 25,000 GPS-enabled hand sets.
- Over 16% of handset sales for March 2003 were GPS-enabled.

2. **FCC Requirement:** Ensure that at least 25 percent of all new handsets activated are location-capable no later than **May 31,2003.**

- USCC met this deadline.
- For June 2003, double that, or 53% of new activations were GPS-enabled.

3. **FCC Requirement:** Ensure that at least 50 percent of all new handsets are location-capable no later than **November 30,2003.**

- This was true by June 2003, almost one half-year early.
- In fact, by September 2003, 80% of new activations were GPS enabled.
- In December 2003, 92.9% of USCC's new activations were GPS enabled.

4. **FCC Requirement:** Ensure that 100 percent of all new digital handsets activated are location-capable no later than **May 31,2004.**

- In July 2003, 11 months early, USCC offered only GPS handsets in CDMA markets.
- In July 2004, 97% of USCC handset sales are E911 capable (despite slight delay in CDMA conversion in several markets).
- In addition to efforts above, in 2005, USCC:
  - prevented activation, repair, or replacing with non-E911 capable telephones.
  - tripled its campaigns targeting customers with non-E911 capable phones.
  - relaxed equipment upgrade requirements for customers with non-GPS handsets.

5. **FCC Requirement:** Ensure that penetration of location-capable handsets among it; subscribers reaches 95 percent no later than **December 31,2005.**

- USCC was just under 89% penetration by December 31,2005.
- In December 2005, 1<sup>st</sup> and 2<sup>nd</sup> Quarter 2006, USCC conducted unmatched offer to give away (for a penny) free phones costing in excess of \$100 with no conditions.
  - The "take rate" is about 40 percent.
  - USCC gives away in excess of 205,000 free phones (for a penny).
- As of March 31,2006, USCC's penetration level was 91.48 percent.
- As of July 15,2006, USCC's penetration level was 94.84 percent.
- By August 31,2006, USCC reached 95 percent.
- As of April 30, 2007, USCC is at 96.05% (and expects 97.6% after analog sunset).
- The April 30, 2007 level includes statistics from several markets acquired from other carriers with penetration levels below USCC's penetration level.